IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

JAN - 8 2002

UNITED STATES OF AMERICA

vs.

Criminal No. 1:01cr455

ZACARIAS MOUSSAOUI,

Defendant.

COURTROOM TELEVISION NETWORK LLC,

Movant-Intervenor.

NOTICE OF MOTION

PLEASE TAKE NOTICE that on January 9, 2002, at 10:00 am, or as soon thereafter as counsel may be heard, American Broadcasting Cos., Inc., National Broadcasting Company, Inc., and CBS Broadcasting, Inc. through counsel, will move to appear as *amici curiae* in support of Courtroom Television Network's Motion for Leave to Record and Telecast Pretrial and Trial Proceedings at the courthouse for the U.S. District for the Eastern District of Virginia, Alexandria, Virginia, 401 Courthouse Square, Alexandria, VA 22314-4798.



Dated: January 8, 2002 Respectfully submitted,

WILEY REIN & FIELDING LLP

H

Kathleen A. Kirby

William McGrath, Va. Bar No. 33093

Eve J. Klindera

1776 K Street NW Washington, D.C. 20006 (202) 719-3360 Facsimile (202) 719-7049

ATTORNEYS FOR AMICI CURAIE

OF COUNSEL

Nathan Siegel Executive Counsel American Broadcasting Cos., Inc. 1717 DeSales Street, N.W. Washington, D.C. 30036 (202) 222-7137 Facsimile (202) 222-6679

David N. Sternlicht Vice President, Media Law National Broadcasting Company, Inc. 30 Rockefeller Plaza, Room 1002E New York, NY 10112 (212) 664-3305 Facsimile (212) 262-4955

Susanna M. Lowy, Esq. CBS Broadcasting Inc. 1515 Broadway, 49th Floor New York, NY 10036-5794 (212) 846-3758 Facsimile (212) 846-1850

CERTIFICATE OF SERVICE

I hereby certify that, on this 8th day of January 2002, I served true and correct copies of the foregoing **Notice of Motion** by hand-delivery or first class U.S. Mail, postage pre-paid, as indicated below, upon counsel for the parties as follows:

By Hand Delivery

Frank W. Dunham, Jr.
Office of the Federal Public Defender
401 Courthouse Square
Alexandria, VA 22314

Robert A. Spencer United States Attorney's Office 2100 Jamieson Avenue Alexandria, VA 22314-5794

Lee Levine
Jay Ward Brown
Cameron Stracher
Levine Sullivan & Koch, LLP
1050 17th Street, N.W.
Suite 800
Washington, DC 20036

By First Class Mail

Edward B. MacMahon 107 East Washington Street Middleburg, VA 20118

Gerald Thomas Zerkin Office of the Public Defender One Capital Square, Suite 1100 830 East Main Street Richmond, VA 23219

Jonathan Donellan, Esq. Assistant General Counsel Cable News Network LP, LLLP One CNN Center Atlanta, GA 30303

Lucy Dalglish, Esq.
Executive Director
Reporters Committee for Freedom of the Press
1815 N. Ft. Myer Dr., Suite 900
Arlington, VA 22209

Eve J. Klindera